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February 8, 2022

**Via ECF**

Honorable Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Shaw-Nae Dixon, et al. v. Bill De Blasio, et al.**  
**Civil Action No. 1:21-cv-05090-BMC**  
**Our File No. 01016**

Dear Judge Cogan:

As Your Honor is aware, this firm represents the plaintiffs in the above referenced matter. Presently pending before Your Honor is the defendants' motion to dismiss. Plaintiffs' opposition to this motion is currently due Monday, February 14, 2022. With the consent of my adversary, I respectfully request a 30 day extension to oppose the pending motion to dismiss, as our Appeal to the Second Circuit is still pending. We have filed our brief, defendants have filed their brief, and we have filed a motion to strike part of defendants' brief which seeks to expand the record. Thus, it is unlikely that the appeal will be decided for at least 30 days.

We thank Your Honor for your consideration of the above.

Respectfully yours,

MURRAY-NOLAN BERUTTI LLC

*Ronald A. Berutti*

By: \_\_\_\_\_

Ronald A. Berutti

RAB:jm

cc: Kerri A. Devine, Esq. (via ECF)